

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT – 2023/2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the association's slavery and human trafficking statement for the financial year ended 31 March 2024.

Introduction – In October 2015, the Modern Slavery Act came into force which requires all businesses with a turnover of more than £36m to publish a statement setting out its actions to understand and address all potential slavery and human trafficking risks within their organisation and associated supply chains.

Structure – Newport City Homes ("NCH" or "the association") is a Registered Social Landlord (RSL) providing homes and services for more than 20,000 customers living in over 10,100 homes across the city of Newport. The association is uniquely placed to play a key role in ensuring customers and communities are given opportunity to grow and succeed. It currently employs 464 colleagues with an annual turnover of £61 million.

Due Diligence – The association has safeguards in place that require its suppliers and contractors to comply with the Modern Slavery Act and commits to never knowingly engaging suppliers or contractors involved in slavery and/or human trafficking. With robust checks in place, the risk of slavery and human trafficking across the association and within its supply chain has been assessed as low. Nevertheless, the association is committed to a zero-tolerance approach to slavery and human trafficking and will act ethically and with integrity across the association and associated supply chain.

Action taken – The association has already taken some measures to reduce the risk of modern slavery and human trafficking and is committed to improving its practices further. Policies, procedures and processes are in place that reflect its commitment to acting ethically and with integrity:

- The procurement tender process requires all potential contractors/suppliers, with a turnover of £36m and above, to confirm in writing that they comply with the Modern Slavery Act.
- As part of the tender procurement process, all contractors/suppliers, with a turnover of £36m and above, will, ensure that any sub-contractors/suppliers providing services to the association, comply with the Modern Slavery Act 2015.
- The anti-bribery policy is committed to applying the highest standards of ethical conduct and integrity across the association's activities. Every colleague and individual acting on the association's behalf is responsible for maintaining the association's reputation and for conducting business honestly and professionally.
- The whistleblowing policy is committed to the highest standards of quality, transparency and accountability, with an established procedure for raising a whistleblowing concern in confidence and compliant with current relevant legislation.

- To help prevent slavery and human trafficking in NCH properties:
 - Prospective customers have their eligibility to housing assessed by Newport City Council (NCC) who are the owners of the common housing register within Newport.
 - The association carries out a 'Getting to Know You' assessment with all new applicants to validate the information provided before an offer of accommodation is made.
 - The association continuously refreshes its insight data upon each interaction with customers to mitigate the risk of tenancy fraud.
- The terms of the occupation contract allow for a full investigation into any potential breaches of occupancy, including illegal or immoral use of the premises, working with partner agencies to resolve such cases.
- Colleagues are aligned to neighbourhoods with dedicated Neighbourhood Managers, Customer Account Managers and Housing Support Advisors working collaboratively at a local level to identify and support customers who may be vulnerable.
- The association's Neighbourhood Managers work in partnership with Gwent Police Cuckoo Watch, with the aim of identifying and taking enforcement action against any perpetrators of Modern Day Slavery or cuckooing activity.
- Colleagues operate within safeguarding guidelines and relevant roles are trained to identify, monitor and support vulnerable customers, linking in with external support providers as necessary.
- The code of conduct policy commits all colleagues and board members to integrity of actions and transparency, thereby avoiding any suggestion of influence by improper motives.
- The recruitment process includes a mandatory check of eligibility to work in the UK.
- Terms and conditions of employment are fair, and the association is committed to promoting dignity and equality both at work and in the services provided to customers.
- Relevant and proportionate training is provided to colleagues to ensure that they are familiar with safeguarding, modern slavery and equality, diversity and inclusion.

Commitment – We will keep our policies and procedures up to date to ensure that we are fully aware and compliant with the actions we need to take against modern slavery and human trafficking.

This statement has been reviewed by the Chief Executive Officer and approved by the NCH board on 24 July 2024 and will be updated annually.

A handwritten signature in blue ink, appearing to read "Ceri Doyle".

Ceri Doyle
Chief Executive

A handwritten signature in blue ink, appearing to read "Lynda Sagona".

Lynda Sagona
Chair of Board